UNITED STATES COURT OF APPEALS
FOR DISTRICT OF COLUMBIA CIRCUIT

FEB - 6 2019

RECEIVED

ARGUED DECEMBER 14, 2018

UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

No. 18-3071

IN RE: GRAND JURY SUBPOENA

MOTION OF THE UNITED STATES TO UNSEAL THE RESPONSE OF THE UNITED STATES TO MOTION TO UNSEAL

The government has submitted a response to the Reporters Committee for Freedom of the Press's motion to unseal. "Records, orders, and subpoenas relating to grand-jury proceedings must be kept under seal to the extent and as long as necessary to prevent the unauthorized disclosure of a matter occurring before a grand jury." Fed. R. Crim. P. 6(e)(6). The Court has accordingly treated the government's response as presumptively sealed in this grand jury matter. But because the response does not contain any material that must be sealed to protect a matter occurring before the grand jury, the government respectfully requests under D.C. Circuit Rule 47.1(c) that the response be unsealed.

CONCLUSION

WHEREFORE, the government respectfully requests that this motion to unseal be granted, and that the response of the United States to the Reporters Committee's motion to unseal be unsealed.

Respectfully submitted,

ROBERT S. MUELLER, III
Special Counsel

MICHAEL R. DREEBEN
ZAINAB AHMAD
SCOTT A.C. MEISLER
ADAM C. JED
Special Counsel's Office
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, D.C. 20530
Telephone: (202) 616-0800

JESSIE K. LIU
United States Attorney

ELIZABETH TROSMAN
JONATHAN KRAVIS
Assistant United States Attorneys

/s/
ERIC HANSFORD
D.C. Bar #1017785
Assistant United States Attorney
555 Fourth Street, NW, Room 8104
Washington, D.C. 20530
Eric.Hansford@usdoj.gov
(202) 252-6829

CERTIFICATE OF COMPLIANCE WITH RULE 27(d)

I HEREBY CERTIFY pursuant to Fed. R. App. P. 32(g) that this motion contains 158 words, and therefore complies with the type-volume limitation of Fed. R. App. P. 27(d)(2)(A). This motion has been prepared in 14-point Century Schoolbook, a proportionally spaced typeface.

/s/
ERIC HANSFORD
Assistant United States Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have caused a copy of the foregoing motion to be served by electronic means, via email, upon counsel for movant Reporters Committee for Freedom of the Press, Theodore J. Boutrous, tboutrous@gibsondunn.com, and counsel for the witness, Brian D. Boone, brian.boone@alston.com, on this 6th day of February, 2019.

/s/
ERIC HANSFORD
Assistant United States Attorney